## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Qudian Inc. Securities Litigation	Master File No. 1:17-cv-09741-JMF

# NOTICE OF PLAINTIFFS' MOTION FOR RECONSIDERATION OF ORDER DISMISSING PLAINTIFFS' DATA BREACH CLAIMS ALLEGED IN THE CONSOLIDATED SECOND AMENDED CLASS ACTION COMPLAINT

PLEASE TAKE NOTICE that as soon as the matter may be heard before the Honorable Jesse M. Furman, United States District Judge, at the Thurgood Marshall United States Courthouse, Courtroom 1105, 40 Foley Square New York, NY 10007, Lead Plaintiffs Alan B. Hertz and the Alan Hertz Family 2012 Trust and additional plaintiff Darwin Sutanto (collectively, "Plaintiffs"), through their undersigned counsel, will move this Court for an order vacating the dismissal of Plaintiffs' data breach claims alleged in the Consolidated Second Amended Class Action Complaint (ECF No. 143).

This Motion is based upon the accompanying Memorandum of Points and Authorities, the pleadings and other filings herein, and such other written and oral argument as may be permitted by the Court.

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#### Respectfully submitted,

Dated: November 8, 2019

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Co-Lead Counsel for the Plaintiffs and the Class

PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On November 8, 2019, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 8, 2019.

s/ Joseph D. Cohen
Joseph D. Cohen